

**EMERGENCY MOTION OF THE RECEIVER FOR AN ORDER
REQUIRING STUDIO ENTERPRISE MANAGER, LLC AND
JOHN J. ALTORELLI TO SHOW CAUSE WHY THEY SHOULD
NOT BE HELD IN CONTEMPT OF THIS COURT FOR THEIR
VIOLATIONS OF THE INJUNCTIONS CONTAINED IN THE
AMENDED ORDER APPOINTING RECEIVER (Doc 150)**

Mark E. Dottore, the duly appointed and acting receiver herein (the “**Receiver**”) for the Receivership Entities¹, hereby moves the Court, on an

¹ The “Receivership Entities” are South University of Ohio LLC, Dream Center Education Holdings LLC, The DC Art Institute of Raleigh-Durham LLC, The DC Art Institute of Charlotte LLC, DC Art Institute of Charleston LLC, DC Art Institute of Washington LLC, The Art Institute of Tennessee - Nashville LLC, AiTN Restaurant LLC, The Art Institute of Colorado LLC, DC Art Institute of Phoenix LLC, The Art Institute of Portland LLC, The Art Institute of Seattle LLC, The Art Institute of Pittsburgh, DC LLC, The Art Institute of Philadelphia, DC, LLC, DC Art Institute of Fort Lauderdale LLC, The Illinois Institute of Art LLC, The Art Institute of Michigan LLC, The Illinois Institute of Art at Schaumburg LLC, DC Art Institute of Phoenix, LLC and its direct subsidiaries the Art Institute of Las Vegas LLC, the Art Institute of Indianapolis, LLC, and AiIN Restaurant LLC; Dream Center Argosy University of California LLC and its direct subsidiaries, and Argosy Education Group LLC; Dream Center Education Management LLC; and, South

emergency basis, for the entry of an order requiring Intervenor Studio Enterprise Manager, LLC (“**Studio**”) and John J. Altorelli (“**Altorelli**”), the person who is in control of Studio, to show cause why they should not be held in contempt of this Court’s Amended Order Appointing Receiver [Doc. 150] (the “**Amended Receiver Order**”)².

Studio, at the direction of Altorelli, has been making offers of employment to employees of Dream Center Education Holdings, LLC (“**DCEH**”)—employees who are critical to the operation of the Shared IT Platform or to ensuring compliance with the EDMC Consent Judgment. Studio has also been negotiating with the landlord of the premises at which the Shared IT Platform is located, in another step meant to displace the Receiver. Studio has further made efforts to abscond with very valuable IP assets within DCEH’s control.

If Studio’s violations of the Amended Receiver Order continue, the Receivership will be gutted of its most important assets and the Receiver will be incapable of carrying out his duties in this case.

WHEREFORE, the Receiver respectfully requests that this Court rule or set a show cause hearing as soon as possible and thereby hold Studio and Altorelli in contempt and ordering them to cease and desist from any interference with the Receiver, the Receivership Entities, and the Property.

University of Michigan LLC. *See* Amended Order Appointing Receiver [Docket no. 150, filed March 13, 2019] (the “**Amended Receiver Order**”).

² Capitalized terms used but not defined in this motion shall have the meanings given to them in the Amended Receiver Order.

Dated: April 11, 2019

Respectfully submitted,

/s/ James W. Ehrman

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